

McDERMOTT WILL & EMERY LLP

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*Counsel to the Estate of Henry S. Moyer, Jr. and
Nancy Moyer, individually and as personal
representative of the Estate of Henry S. Moyer, Jr.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE MOYER GROUP, INC.,

Debtor.

JOHN S. PEREIRA, Chapter 7 Trustee for the
estate of The Moyer Group, Inc.,

Chapter 7

Case No. 16-10261 (MG)

Adv. No. 18-01011 (MG)

Plaintiff,

v.

FRENKEL BENEFITS, LLC, ROBERT
ROGERS, THE ESTATE OF HENRY S.
MOYER, JR., NANCY MOYER,
INDIVIDUALLY AND AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF
HENRY S. MOYER, JR. AND LISA SAEZ
A/K/A LISA SAEZ-WOLCHUCK,

Defendants.

**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF ALL PLEADINGS AND DOCUMENTS**

PLEASE TAKE NOTICE that M. Elias Berman of the law firm McDermott Will &

Emery LLP hereby appears as counsel to the Estate of Henry S. Moyer, Jr. and Nancy Moyer,
individually and as personal representative of the Estate of Henry S. Moyer, Jr., Defendants in

this adversary proceeding and request, pursuant to Rules 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), that copies of all notices given or required to be given, and all papers served or required to be served in this adversary proceeding, be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, notices of any application, complaint, demand, hearing, motion, petition, order, pleading or other request, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, electronic mail or otherwise, that is filed or given in connection with the above-captioned proceeding.

PLEASE TAKE FURTHER NOTICE that this request shall not be deemed or construed to be a waiver of any substantive or procedural rights of the Estate of Henry S. Moyer, Jr. and Nancy Moyer, individually and as personal representative of the Estate of Henry S. Moyer, Jr., Defendants, including, without limitation: (i) to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the Southern District of New York (the “District Court”); (ii) to have a trial by jury in any proceeding so triable in this chapter 7 case or any case, controversy, or proceeding related to this chapter 7 case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which

the Estate of Henry S. Moyer, Jr. and Nancy Moyer, individually and as personal representative of the Estate of Henry S. Moyer, Jr., Defendants may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: New York, New York
June 25, 2018

McDERMOTT WILL & EMERY LLP

/s/ M. Elias Berman

Timothy W. Walsh, Esq.

M. Elias Berman, Esq.

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